UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO

Weaver Leather, LLC)
Plaintiff,) Case No. 5:19cv1990- JRA
) Judge John R. Adams
VS.)
)
Climbing Innovations, LLC)
1)
and)
Richard Mumford)
Kicharu Muniforu)
Defendants.	,)

<u>DEFENDANTS' MOTION TO RESCHEDULE</u> <u>CASE MANAGEMENT CONFERENCE</u>

Defendants respectfully request the Court to reset the Case Management Conference to either October 21 or 22, or at such other date and time convenient for the Court after October 19. Plaintiff has advised that it does not oppose the motion and both Plaintiff's counsel and a representative of Weaver Leather LLC are available on October 21 or 22.

During the hearing last Thursday (September 26), the Court set the date for the Case Management Conference as October 16. Undersigned counsel for Defendants mistakenly believed that Mr. Mumford was available on October 16. However, unbeknown to counsel, Mr. Mumford in fact has a conflict from October 10 to October 19 because of a previously planned trip to attend the "2019 Tree Climbers' Rendezvous" in California. Mr. Mumford previously prepaid for nonrefundable airfare and accommodations, and his climbing equipment to be used during the event has already been shipped. Mr. Mumford is one of the featured speakers and he will also be providing training to attendees during the event.

Defendants are certainly mindful of the scheduling difficulties typically facing the Court and they do not make this request lightly. However, this is an annual event that Mr. Mumford attends almost every year and he deems it important to the success of Climbing Innovations.

Defendants therefore respectfully request the Court to reschedule the Case Management Conference to either October 21 or 22, or to some other date convenient for the Court after October 19.

Respectfully submitted,

Dated: September 30, 2019

s/ William F. Long

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Counsel for Climbing Innovations, LLC and Richard Mumford

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CERTIFICATE OF SERVICE

I certify that on September 30, 2019, I served the foregoing MOTION TO RESCHEDULE CONFERENCE OF THE PARTIES on all counsel of record by filing with the ND Ohio electronic filing system and also by emailing it to all counsel of record.

s/ William F. Long